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November 17, 2021

VIA ECF

The Honorable P. Kevin Castel
United States District Judge
United States District Court for the
Southern District of New York
Courtroom 11D
500 Pearl Street
New York, New York 10007

Conference is adjourned from November 22, 2021 to January 10, 2022 at 12:30 p.m. The call-in information for all teleconferences is:

Dial-in: (888) 363-4749 Access Code: 3667981.

SO ORDERED.

Dated: 11/18/2021

A handwritten signature in black ink, reading 'P. Kevin Castel'.

Re: *Exhibition Employees Local 829 Pension Fund et al. v. Spring Show NYC LLC*
Civil Action No. 21-cv-04977 (PKC)

Dear Judge Castel:

Pursuant to Section 1(B) of Your Honor's Individual Practices, we write to respectfully request an adjournment of 30 days for the pretrial conference presently scheduled for November 22, 2021 at 2:30 p.m.

The Plaintiffs filed this action on June 4, 2021. An Initial Pretrial Conference was held on September 2, 2021 and the Plaintiffs advised the Court that it would be moving for default judgment by September 30, 2021. Before the Clerk of the Court issued a Certificate of Default, Counsel for the Defendant entered his appearance on September 30, 2021 and, with the consent of the undersigned Counsel, requested an extension to file an Answer to the Complaint, which the Court granted on October 14, 2021. The Defendant filed an Answer to the Complaint on November 5, 2021 and the Court scheduled a Conference for November 22, 2021, which was later moved from 12:15 p.m. to 2:30 p.m. on the same day.

Since Counsel for the Defendant has made his appearance, the parties have conferred in good faith and have informally exchanged documentation that may help narrow the issues in instant case. The parties believe that further informal discussions may resolve many of the issues in this case. Given this initial progress, the parties respectfully request adjournment of the November 22, 2021 Conference for 30 days to permit them to explore settlement of this matter. This adjournment request is the first such request made by the Plaintiffs and is requested jointly with opposing counsel. As the parties remain in ongoing discussions that may lead to potential

settlement, and pursuant to Your Honor's Individual Practices, the parties are amenable to an adjournment of 30 days.

Very truly yours,

/s/ John R. Harney

John R. Harney

cc: Jeffrey D. Pollack, Esq. (via ECF)
Adam K. Brody, Esq. (via ECF)
Evelyn Haro, Esq.